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14 ***Class Counsel***

15 **UNITED STATES DISTRICT COURT**  
16 **SOUTHERN DISTRICT OF CALIFORNIA**

17 KIM ALLEN, LAINIE RIDEOUT  
18 and KATHLEEN HAIRSTON, on  
19 behalf of themselves, all others  
20 similarly situated, and the general  
21 public,

22 Plaintiffs,

23 SIMILASAN CORPORATION,

24 Defendant.

Case No.: 3:12-cv-376-BTM (WMC)

**CLASS ACTION**

**PLAINTIFFS' OBJECTIONS TO  
DEFENDANT'S EXHIBIT LIST**

Judge: Hon. Cynthia A. Bashant  
Room: 4B (Schwartz Courthouse)

Complaint Filed: February 10, 2012  
Trial Date: March 29, 2016  
Pretrial Conference: February 1, 2016  
Conference Time: 11:00 am

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 26(a)(3) and this Court’s Scheduling Order entered April 16, 2015 [ECF No. 149], Plaintiffs Lainie Rideout and Kathleen Hairston (“Plaintiffs”) hereby submit the following objections to Defendant Similasan Corporation’s exhibit list contained in their pretrial disclosures [ECF No. 189]:

No.	Date Marked	Date Admitted	Description	Objection
500.			JOCs SIM 00050012-50264	FRE 602, 801, 802, 901
501.			JOCs SIM 00042974-43002	FRE 602, 802, 901
502.			Pharmacy Times 2008 SIM 00003768-3770	FRE 401, 402, 602, 801, 802, 901
503.			Pharmacy Times 2010 SIM 00027759	FRE 401, 402, 602, 801, 802, 901
504.			Word of Mom - PER SIM 00016472	FRE 401, 402, 602, 801, 802, 901
505.			similasan wayback 1-2008 ( <a href="http://www.similasanusa.com/HowOurProductsWork.cfm">http://www.similasanusa.com/HowOurProductsWork.cfm</a> )	FRE 801, 802
506.			similasan wayback 1-2010 ( <a href="http://www.similasanusa.com/HowOurProductsWork.cfm">http://www.similasanusa.com/HowOurProductsWork.cfm</a> )	FRE 801, 802
507.			similasan wayback 4-2012 ( <a href="http://www.similasanusa.com/abouthomeopathy">http://www.similasanusa.com/abouthomeopathy</a> )	FRE 801, 802
508.			<a href="http://www.similasanusa.com/about-homeopathy">http://www.similasanusa.com/about-homeopathy</a>	FRE 801, 802
509.			<a href="http://www.similasanusa.com/faqs">http://www.similasanusa.com/faqs</a>	FRE 801, 802
510.			Bellavite, et al., Advances in homeopathy and immunology: a review of clinical research SIMX001054	FRE 401, 402, 403, 602, 801, 802, 901

1	511.			Bond, Richard, Is paradoxical pharmacology a strategy worth pursuing? SIMX001055-1058	FRE 401, 402, 403, 602, 801, 802, 901
2					
3	512.			Brinkhaus, et al., Homeopathic arnica therapy in patients receiving knee surgery: Results of three randomized double-blind trials SIMX 001059-1068	FRE 401, 402, 403, 602, 801, 802, 901
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6	513.			Calabrese, et al, The occurrence of hermetic dose responses in the toxicological literature, the hormesis database: an overview SIMX 001069-1081	FRE 401, 402, 403, 602, 801, 802, 901
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10	514.			Chatterjee, Barun, The mathematics of Dilution SIMX 001082-1085	FRE 401, 402, 403, 602, 801, 802, 901
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12	515.			Clausen, et al., Review of the use of high potencies in basic research on homeopathy SIMX 001086-1090	FRE 401, 402, 403, 602, 801, 802, 901
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14	516.			Colas, et al., Economic impact of homeopathic practice in general medicine in France SIMX001091-1099	FRE 401, 402, 403, 602, 801, 802, 901
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16					
17	517.			Demangeat, Jean-Louis, Nanosized solvent superstructures in ultramolecular aqueous dilutions: twenty years' research using water proton NMR relaxation SIMX 001100-1118	FRE 401, 402, 403, 602, 801, 802, 901
18					
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21	518.			Demangeat, Jean-Louis NMR water proton relaxation in unheated and heated ultrahigh aqueous dilutions of histamine: Evidence for an air-dependent supramolecular organization of water SIMX 001119-1126	FRE 401, 402, 403, 602, 801, 802, 901
22					
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26	519.			Eskinazi, Daniel, Homeopathy Revisited SIMX001127-1133	FRE 401, 402, 403, 602, 801, 802, 901
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520.			Fisher, et al., Correspondence SIMX 001134-1135	FRE 401, 402, 403, 602, 801, 802, 901
521.			Grimaldi-Bensouda, et al., Management of Upper Respiratory Tract Infections by Different Medical Practices, Including Homeopathy, and Consumption of Antibiotics in Primary Care: The EP13 Cohort Study in France 2007-2008 SIMX 001135-1141	FRE 401, 402, 403, 602, 801, 802, 901
522.			Grimaldi-Bensouda, et al., Utilization of psychotropic drugs by patients consulting for sleeping disorders in homeopathic and conventional primary care settings: the EP13 cohort study SIMX 001142-1148	FRE 401, 402, 403, 602, 801, 802, 901
523.			Haidvogel, et al., Homeopathic and conventional treatment for acute respiratory and ear complaints: A comparative study on outcome in the primary care setting SIMX 001148-1158	FRE 401, 402, 403, 602, 801, 802, 901
524.			Jonas, et al., Homeopathy and Rheumatic Disease SIMX 001159-1165	FRE 401, 402, 403, 602, 801, 802, 901
525.			Lindt, et al., Correspondence SIMX 001173-1174	FRE 401, 402, 403, 602, 801, 802, 901
526.			Ludtke, et al., The conclusions on the effectiveness of homeopathy highly depend on the set of analyzed trials SIMX 001175- 1182	FRE 401, 402, 403, 602, 801, 802, 901
527.			Mathie, et al., Randomised placebo-controlled trials of individualized homeopathic	FRE 401, 402, 403, 602, 801, 802, 901

			treatment: systematic review and meta-analysis SIMX 001183-1198	
528.			Montagnier, et al., Transduction of DNA information through water and electromagnetic waves SIMX 001199-1205	FRE 401, 402, 403, 602, 801, 802, 901
529.			Rey, Louis, Thermoluminescence of ultra-high dilutions of lithium chloride SIMX 001206-1213	FRE 401, 402, 403, 602, 801, 802, 901
530.			Shang, et al., Are the clinical effects of homeopathy placebo effects? SIMX 001214-1220	FRE 401, 402, 403, 602, 801, 802, 901
531.			Venard, et al., Comparative Analysis of Gelsime and <i>Gelsemium sempervirens</i> Activity on Neurosteroid Allopregnanolone Formation in the Spinal Cord and Limbic System SIMX 001221-1231	FRE 401, 402, 403, 602, 801, 802, 901
532.			Witt, et al., The <i>in vitro</i> evidence for an effect of high homeopathic potencies – A systematic review of the literature SIMX 001232-1242	FRE 401, 402, 403, 602, 801, 802, 901
533.			Witt, et al., Homeopathic medical practice: Long term results of a cohort study with 3981 patients SIMX 001243-1250	FRE 401, 402, 403, 602, 801, 802, 901
534.			Witt, et al., Outcome and costs of homeopathic and conventional treatment strategies: A comparative cohort study in patients with chronic disorders SIMX 001252-1258	FRE 401, 402, 403, 602, 801, 802, 901
535.			Compliance Policy Guide Sec. 400.400	
536.			Amazon.com and website testimonials SIM00022769-22771	FRE 401, 402, 403, 602, 801, 802, 901

537.			Earache relief from glycerin	FRE 401, 402, 403, 602, 801, 802, 901
538.			Saline nasal irrigation	FRE 401, 402, 403, 602, 801, 802, 901
539.			Nielson data, SIM 00050386 – 50389	FRE 401, 402, 403, 602, 801, 802, 901
540.			Similasan Nielsen Xtab Rpt 1 21 15 SIM00050386-50389 (Native)	FRE 401, 402, 403, 602, 801, 802, 901
541.			Plaintiff Lanie Rideout's Responses to Defendant Similasan Corporation's 1st Set of Interrogatories 2014-01-31	FRE 401-403
542.			Plaintiff Lanie Rideout's First Set of Supplemental Responses to Defendant Similasan Corporation's 1st Set of Interrogatories 2014-03-14	FRE 401-403
543.			Plaintiff Lanie Rideout's Second Set of Supplemental Responses to Defendant Similasan Corporation's 1st Set of Interrogatories 2014-06-30	FRE 401-403
544.			Plaintiff Lanie Rideout's Responses and Objections to Defendant Similasan Corporation's Interrogatories (Set Two) 2015-08-28	FRE 401-403
545.			Plaintiff Lanie Rideout's Responses to Defendant Similasan Corporation's 1st Set of Requests for Admission 2015-08-28	FRE 401-403
546.			Plaintiff Kathleen Hairston's Responses to Defendant Similasan Corporation's 1st Set of Interrogatories 2014-01-31	FRE 401-403

547.			Plaintiff Kathleen Hairston's First Set of Supplemental Responses to Defendant Similasan Corporation's 1st Set of Interrogatories 2014-03-14	FRE 401-403
548.			Plaintiff Kathleen Hairston's Second Set of Suppl Responses to Defendant Similasan Corporation's 1st Set of Interrogatories 2014-04-15	FRE 401-403
549.			Plaintiff Kathleen Hairston's 3rd Set of Suppl Responses to Similasan Corporation's 1st Set of Interrogatories 2014-06-30	FRE 401-403
550.			Plaintiff Kathleen Hairston's 4th Set of Suppl Responses to Defendant Similasan Corporation's 1st Set of Interrogatories 2014-05-06	FRE 401-403
551.			Plaintiff Kathleen Hairston's Responses and Objections to Defendant Similasan Corporation's Interrogatories (Set Two) 2015-08-28	FRE 401-403
552.			Plaintiff Kathleen Hairston's Responses to Defendant Similasan Corporation's First Set of Requests for Admission 2015-08-28	FRE 401-403
553.			2007-2008 Financial Statements SIM 26780-26797	
554.			2009-2010 Financial Statements SIM 27149-27166	
555.			2010-2011 Financial Statements SIM 27173-27188	
556.			2011-2012 Financial Statements SIM 50322-50341	
557.			2013-2014 Financial Statements SIM 31012-31027	
558.			ECRM Eye_Ear August 2010_v3 SIM 0000758	

559.			IRI data SIM 50358	
560.			Nielsen data SIM 001217	
561.			Nielsen data SIM 001223	
562.			Nielsen data SIM 001229	
563.			Similasan 2008 wholesale price list SIM 000423	
564.			Similasan 2102 wholesale price list SIM0025345	
565.			Similasan 2010 Marketing Plan Eye Care and Cough Syrups SIM 000011	
566.			Similasan Earache, Nasal, and Well-Being categories presentation SIM 000018	
567.			Similasan Monthly POS Overview Snippet 2-22-15 SIM 0048492-48497	
568.			Similasan quarterly profit report 2008-2012 (woHFR) SIM 0030961-30967	
569.			Similasan summary of profit in CA SIM 0050345-50351	FRE 602, 901
570.			Gilli, et al., Enthalpy-Entropy Compensation in Drug Receptor Binding SIMX 0000941-944	FRE 401, 402, 403, 602, 801, 802, 901
571.			City of San Diego Water Fluoridation SIMX000945-947	FRE 401, 402, 403, 602, 801, 802, 901
572.			U.S. Public Health Service Recommendation for Fluoride Concentration in Drinking Water SIMX 000948-961	FRE 401-403
573.			McGivern, Joseph, Ziconotide: a review of its pharmacology and use in the treatment of pain SIMX 000962-979	FRE 401, 402, 403, 602, 801, 802, 901
574.			Smith, et al., Beyond Picomolar Affinities: Quantitative Aspects of Noncovalent Binding of Drugs to Proteins SIMX 000980-988	FRE 401, 402, 403, 602, 801, 802, 901



575.			Schramm, Vern L., Transition States, Analogues, and Drug Development SIMX 000989-999	FRE 401, 402, 403, 602, 801, 802, 901
576.			Liu, et al., Femtomolar Concentrations of Dynorphins Protect Rat Mesencephalic Dopaminergic Neurons Against Inflammatory Damage SIMX 001000-1008	FRE 401, 402, 403, 602, 801, 802, 901
577.			Chiba, et al., Development of Femtomolar-Acting Hunam Derivative Named Colivelin... SIMX 001009-1018	FRE 401, 402, 403, 602, 801, 802, 901
578.			Kuntz, et al., The maximal affinity of ligands SIMX 001019-1024	FRE 401, 402, 403, 602, 801, 802, 901
579.			Singh, et al., The resurgence of covalent drugs SIMX 001025-1035	FRE 401, 402, 403, 602, 801, 802, 901
580.			Singh, et al., Targeted covalent drugs of the kinase family SIMX 001036-1041	FRE 401, 402, 403, 602, 801, 802, 901
581.			Carmi, et al., Clinical Perspectives for irreversible tyrosine kinase inhibitors in cancer SIMX 001042-1053	FRE 401, 402, 403, 602, 801, 802, 901
582.			Williams, et al., Relationship between the humidity and temperature of inspired gas and the function of the airway mucosa SIMX_000019-33	FRE 401, 402, 403, 602, 801, 802, 901
583.			Hostanka, et al., BMC Complementary and Alternative Medicine 2012, 12:100 SIM 00050311 – 50320	FRE 401, 402, 403, 602, 801, 802, 901
584.			Freeman & Mills Retainer Agreement ACKERMAN000001-000007	FRE 602, 901, 401-403

585.			Heart Clinic of San Antonio articles regarding homeopathy Lee_Similasan 00238-248	FRE 401, 402, 403, 602, 801, 802, 901 (not exchanged)
586.			Agreement for Retaining Consulting Services of Jon A. Krosnick KROSNICK000001	FRE 602, 901, 401-403
587.			PLSIMILASAN000001-000290	FRE 401, 402, 403, 602, 801, 802, 901 (not exchanged)
588.			PER/IER Form 766 and recondition approval, SIM0025696-25705 et seq.	FRE 401, 402, 403, 602, 801, 802, 901 (not exchanged)
589.			Form 766 SIM0050342-50344	FRE 401, 402, 403, 602, 801, 802, 901 (not exchanged)

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Dated: January 11, 2016

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